

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on)	Case No. 1:22-cv-06918
behalf of all others similarly situated,)	
)	
Plaintiff,)	Hon. Franklin U. Valderrama
)	
v.)	Magistrate Judge Gabriel A. Fuentes
)	
BELKIN INTERNATIONAL, INC.,)	
)	
Defendant.)	

PLAINTIFF'S MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Plaintiff Dennis Gromov respectfully requests that the Court grant him leave to file under seal the spreadsheet annexed as Exhibit A to the Declaration of Bradley F. Silverman made in support of Plaintiff's motion to compel discovery. As good cause in support thereof, and as permitted by LR78.3, Plaintiff states as follows:

1. Attached as Exhibit A to the Declaration of Bradley F. Silverman is a spreadsheet containing information about Defendant's power bank models.
2. Defendant has designated information in this document as "Confidential" pursuant to the Confidentiality Order dated August 29, 2023 (ECF No. 42).
3. Accordingly, in an abundance of caution, Plaintiff is seeking leave to file the document under seal and has provisionally filed it under seal.
4. On February 14, 2024, counsel for Defendant was notified that Plaintiff would take such action.

THEREFORE, based on good cause shown, Plaintiff requests that it be permitted to file the document under seal. Alternatively, Plaintiff requests that the document remain provisionally under seal until Defendant has an opportunity to respond to this motion.

Date: February 14, 2024

Respectfully submitted,

/s/ Bradley F. Silverman

D. Greg Blankinship (*pro hac vice*)

gblankinship@fbfglaw.com

Bradley F. Silverman (*pro hac vice*)

bsilverman@fbfglaw.com

**FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP**

1 North Broadway, Suite 900

White Plains, NY 10601

Phone: 914-298-3290

Jason A. Ibey (Bar. No. 16691)

jason@kazlg.com

KAZEROUNI LAW GROUP, APC

321 N. Mall Drive, Suite R108

St. George, Utah 84790

Phone: 800-400-6808

Seyed Abbas Kazerounian (Ill. Bar No. 6316129)

ak@kazlg.com

KAZEROUNI LAW GROUP, APC

245 Fischer Avenue, Unit D1

Costa Mesa, CA 92626

Phone: 800-400-6808

William F. Cash III (Ill. Bar No. 6330856)

bcash@levinlaw.com

Matthew D. Schultz (*pro hac vice*)

mschultz@levinlaw.com

**LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN, BARR &
MOUGEY, P.A.**

316 South Baylen Street, Suite 600

Pensacola, FL 32502

Phone: 850-435-7059

Attorneys for Plaintiff Dennis Gromov